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December 6, 1996

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DEC 6 1996

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: Motion of COMSAT Corporation for Extension of Time
FCC File No. 14-SAT-MP/ML-97, RM-7913

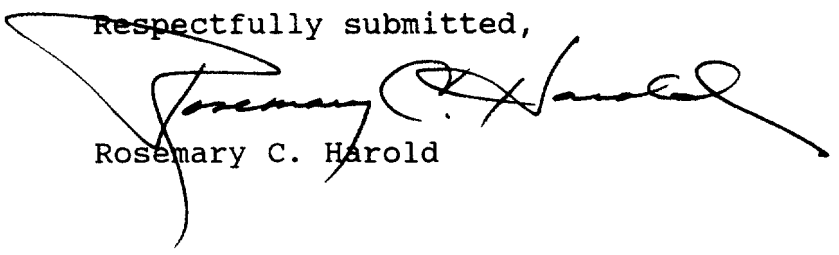
Dear Mr. Caton:

Enclosed for filing in the above-referenced docket is the Motion of COMSAT Corporation ("COMSAT") for a uniform extension of time for the submission of all pleadings that may be filed concerning COMSAT's pending Petition for Partial Relief from the Current Regulatory Treatment of COMSAT World System's Video and Audio Services. This submission consists of the original motion, as executed by counsel for COMSAT, and four copies.

Please date-stamp the attached duplicate upon receipt and return it via the messenger for our files.

Should any questions arise concerning this submission, kindly contact the undersigned.

Respectfully submitted,


Rosemary C. Harold

cc: Donald Gips
Regina Keeney

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
COMSAT Corporation)
)
Petition for Partial Relief from) File No. 14-SAT-MP/ML-97
the Current Regulatory Treatment) RM-7913
of COMSAT World System's)
Video and Audio Services)

To: The Chief, International Bureau
The Chief, Common Carrier Bureau

MOTION OF COMSAT CORPORATION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's rules, COMSAT Corporation ("COMSAT") hereby moves for a uniform extension of time for the submission of all pleadings filed in connection with the above-captioned petition (the "Streamlined Video Petition") under Section 25.154 of the Commission's rules. A brief extension of the pleading cycle deadlines in this matter would serve the public interest by ensuring that all parties have adequate time to obtain copies of the various pleadings in a timely fashion and prepare substantive responses without the difficulties interposed by the holiday calendar.

COMSAT filed the Streamlined Video Petition on October 25, 1996. The Commission's Public Notice, which triggered the pleading cycle, was issued on November 21, 1996.¹ In

¹ Satellite Policy Branch Information: Applications Accepted for Filing, Report No. SPB-68 (dated Nov. 21, 1996) ("Public Notice").

accordance with Sections 1.4 and 25.154 of the Commission's rules, the deadline for filing objections to, or comments on, the Streamlined Video Petition is Monday, December 23, 1996. Should any such pleadings be filed, COMSAT's opposition then would be due on Thursday, January 2, 1997 (or shortly thereafter if service is by mail); with any subsequent pleadings due in accordance with Section 25.154.²

Although COMSAT is loathe to request any delay that would slow the agency's action on its own Streamlined Video Petition, we are concerned that this schedule -- which encompasses two federal legal holidays and falls squarely in a time period traditionally rife with work absences -- may adversely affect the abilities of COMSAT and other interested parties to meet the production demands of the pleading cycle. The intervening Christmas and New Year's holidays, including travel commitments by key personnel at COMSAT, would effectively cut COMSAT's time to prepare its opposition from a 10-day period to six days or less. Similarly, other parties wishing to participate in this proceeding are likely to experience difficulties obtaining copies of documents and/or mustering the personnel needed to prepare thoughtful submissions during the holiday season.

COMSAT therefore respectfully suggests that the deadlines for pleadings in this proceeding be extended uniformly for two weeks. Under this revised pleading cycle, initial objections to, or comments on, the Streamlined Video Petition would then be due on Monday, January 6, 1997, and the timing of subsequent filings would be governed by Section 25.154.

² This motion is being filed in anticipation that objections or similar pleadings will be filed on December 23. Should this expectation not prove true, COMSAT recognizes that the Commission's grant of this motion will become moot.

This uniform two-week delay would harm no interested party other than COMSAT itself, and COMSAT is willing to bear the burden of this delay in the interest of ensuring that the record in this proceeding is as complete and substantive as possible.

Respectfully submitted,

COMSAT Corporation

By: 

Lawrence W. Secrest, III
Rosemary C. Harold

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